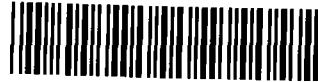


July 25, 2002

US EPA RECORDS CENTER REGION 5



472212

U.S. Environmental Protection Agency
Bernard Shorley
230 South Dearborn Street
Chicago, IL 60604

Re: 5 year Review
Pagel's Pit
Rockford, IL

Mr. Schorle:

On the occasion of the five-year review of Pagel's Pit located in Rockford, Illinois I had the opportunity to speak with you as part of the neighbor reaction on July 18, 2002. As you are aware I have some concerns about the progress and effectiveness of the closure of OU1 at Pagel's Pit. I felt it prudent to follow up my comments in writing so that I clearly have my concerns on the record.

Pagel's Pit is currently operating under a Record of Decision from 1999. I continue to be concerned about the drastic reversal of the Record of Decision from 1991. The 1991 ROD called for closure of the Pit and it's clean up. The clean up was to include the installation of a pump and treat system using the air sparging method. This was to remove the high concentrations of heavy metals and solvents that were pouring out the bottom of the liner. The heavy metals detected included primarily arsenic, thallium, lead, and zinc. Solvents detected included trichloroethene (TCE), dichloroethene (DCE), tetrachloroethene (PCE), and trichloroethane (TCA). All of these pollutants were detected in concentrations exceeding national drinking water standards. The majority of the pollutants in the leachate emanating from Pagel's Pit flow to the west through fractures in the limestone as well as through the coarse gravels in the river valley. However, there are also flow components to the north and south.

Even though evidence of high concentrations of pollution was detected with existing monitor wells, I believe that when observing the hydrogeologic features of the bedrock that the monitor well system was improperly designed. The shallow monitor wells drilled to the west of the landfill were drilled and screened in the fine silts and sands. It is my opinion as a Hydrogeologist that the majority of the leachate flows in the coarse gravels located beneath the fine silts and sands. When the shallow monitor wells were drilled they should have been drilled further down into the coarse gravels to get a true reading of the pollutant levels flowing to the west. This is especially critical considering the large population toward the west relying on water wells drilled one hundred to one hundred twenty feet in depth.

The deep monitor wells were drilled into the dense dolomite at approximately one hundred and twenty to one hundred and fifty feet in depth. It is my opinion that these

wells have also missed the most probable zone of pollutant flow in the bedrock. The majority of the fractures are located in the first thirty to forty feet of the dolomite bedrock. This is where the majority of the groundwater flows. In review, a majority of the pollutant flow has been avoided by improperly positioning the screens in the monitor wells. I believe that prior to any consideration of closure of this superfund site that proper explanations as to the rationale of the monitor well system design should be given. I did explain this during the 1999 ROD public meetings and our meeting last week and did not receive an explanation.

My other concern in regard to the monitor well system is that the Environmental Protection Agency has allowed the "fox to watch the chicken coop." This site was originally placed on the superfund list because the operator was improperly allowing contaminated dumping. The same operator of this site is now responsible for the collection of data on continuing levels of pollutants. It would be reasonable to assume that they desire for the data to indicate a decrease in the pollution levels. This system is wide open for abuse. A better system would include surprise inspections by EPA officials and a majority of the testing and sampling to be done by this governing agency.

The 1999 ROD eliminated the pump and treat clean up requirement and replaced it with monitored natural attenuation. This change at least mandates a monitor well system that correctly monitors the pollution.

The 1999 ROD required the proper capping of Operable Unit One (OU1.) It is my observation that the material used for the final cover of OU1 is improper. Cyanide contaminated soil was hauled from Parson's Casket Superfund Site in Belvidere for several months and was used as the final cover. It was also my observation that attempts were made to plant grass covering in the contaminated soil to no avail. Compost was then used as an additional cover to grow grass. Both of these coverings are improper and will only compound the serious pollution problem in the ground water of this area.

Leachate discharge is also an area of concern. Numerous leachate discharges have been observed flowing into the intermittent streams to the north and south of Pagel's Pit. Most of the leachate releases occur at night and during heavy rains in what seems to be an attempt to hide discharge. Both of the streams then flow into the Kilbuck Creek one-quarter mile to the west. EPA has also documented discharge directly into the Kilbuck Creek with the use of portable hoses. These hoses were documented as being rolled up to be undetected during daylight hours, most notably in 1986. I am aware that this practice has continued even this year. Additionally, leachate springs are present during the spring months along the east slope of OU1. This slope borders Lindenwood Road. This appears to indicate that the springtime rains raise the leachate levels within the landfill thus causing the springs to erupt. This should not occur if the final cover is truly impermeable.

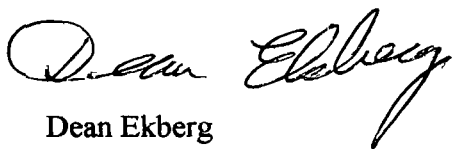
As I am sure that you are aware, residents along Lindenwood Road were evacuated from their homes this past spring due to high level of landfill gases detected in their basements. This appeared to coincide with the decrease in gas venting at the surface of the landfill.

The decrease in venting may have increased underground gas pressures resulting in an increase in underground gas flow into neighboring basements. Neighbors to the east were tested but neighbors to the northeast and southeast were not even informed of this serious problem. Surface venting of gases has occurred extensively since the 1999 ROD. I thought that the proper disposal of landfill gases is through flaring rather than venting. Neighbors, including myself, have experienced nausea and detected a foul gas smell on numerous occasions in the past couple of years. I believe that this could be a result of inappropriate gas venting.

I realize that large-scale garbage disposal is an important and necessary activity of today's society. My concern is not that the area has a garbage dump, but that EPA approved practices for this business are not being followed. Pagel's Pit was put on the National Priority List in 1986 for a very good reason. Extremely high level of solvents and heavy metals are present. Residents in this area who rely on well water for daily living are being put in danger. My concerns are for their health and well-being. When inaccurate measures are used a false sense of security is given to these residents. I believe that every precaution should be used to protect them from any possible side effects of drinking and utilizing water that is less than acceptable by EPA standards. I believe that in-depth health studies will reveal that the high percentage of cancer and other diseases rampant in the area are a result of drinking polluted well water. This is further evidence that natural attenuation of pollution is not working!

I look forward to hearing the results of your review and hope that you will find it important and necessary to address all of these issues in your findings. Thank you for your time and putting the protection of our lives and living environment as your TOP PRIORITY!

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Ekberg". The signature is fluid and cursive, with the first name "Dean" and last name "Ekberg" clearly distinguishable.

Dean Ekberg
Owner, Ekberg Material Inc.
8200 Lindenwood Road